

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

BRIAN TAYLOR,

Plaintiff,

v.

CORELOGIC SAFERENT, LLC,

Defendant.

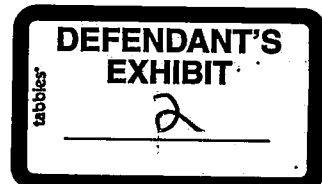
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Civil Action 1:15-cv-1405-TSE-JFA

DECLARATION OF JASON DOYLE

I, Jason Doyle, pursuant to 28 U.S.C. § 1746, declare and swear as follows:

1. I am over the age of 18 and competent to give this Declaration.
2. I am employed by CoreLogic SafeRent, LLC ("SafeRent").
3. The facts set forth herein are based upon my personal knowledge, and if I were called upon to testify to them, I could and would competently do so.
4. I have reviewed the document that is described herein, and which was attached as "Exhibit 3" to Plaintiff's Motion to Seal ("Exhibit 3"). That document was previously produced by SafeRent, where it was marked as "Confidential" under the Stipulated Protective Order and Non-Waiver Order.
5. SafeRent has developed a proprietary algorithm to match public record data with information provided by its customers. SafeRent has invested a great deal of time and resources into maintaining and refining that proprietary algorithm. That algorithm, and SafeRent's analysis thereof and refinements thereto, provides SafeRent with a competitive advantage in the marketplace over its competitors. Public disclosure of information about how SafeRent's algorithm works and/or the enhancements SafeRent has made to it would provide SafeRent's



competitors with valuable insight into the manner in which SafeRent prepares the data it returns to its customers, and it would allow such competitors to institute a competing system without incurring any of the costs borne by SafeRent in developing and analyzing that process.

6. SafeRent's status as a participant in the consumer data industry, which is highly-attuned to market research and intelligence, heightens the concern that its competitors will gain access to any publicly-disclosed proprietary information and will then use such information to gain a competitive advantage in the marketplace.

7. SafeRent keeps its policies and procedures regarding its matching process – and any analysis of that matching process – strictly confidential to ensure that such information is not disclosed to third parties, including its competitors. It is SafeRent's general policy to keep the information that is contained in Exhibit 3 confidential. When such information or documentation is requested in litigation, such as here, SafeRent either objects to its production on the basis of its proprietary content or seeks the entry of an appropriate protective order prior to production.

8. SafeRent executes non-disclosure agreements with any party with whom it shares its proprietary information. To that end, SafeRent would not share Exhibit 3 with any third party absent a non-disclosure and confidentiality agreement.

9. I am voluntarily making this declaration of my own free will. I declare under penalty of perjury that the foregoing is true.

DATED: March 10, 2016

/s/ Jason Doyle
Jason Doyle